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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,

Plaintiff,

vs.

L&T INTERNATIONAL
CORPORATION et al.,

Defendant(s).

ABELLANOSA, JOANNA, et. al.,

Plaintiffs in Intervention.

Case No.: CV-07-0029

JOINT STIPULATION REGARDING
STAY OF DISCOVERY AND
APPLICATION TO AMEND
SCHEDULING ORDER

Current Discovery Cut Off: 8-25-2008

Proposed Discovery Cut Off:

Hon. Alex R. Munson

1 TO THE JUDGE OF THE UNITED STATES DISTRICT COURT:

2 Defendants Tan Holdings Corporation, L&T Group of Companies, L&T
3 International Corporation, Tan Holdings Overseas Incorporation, Concorde
4 Garment Manufacturing Corporation, Micro Pacific Inc., and Seasonal
5 Incorporated, collectively "L&T"), plaintiff United States Equal Employment
6 Opportunity Commission ("EEOC"), and Plaintiff In Intervention ("Plaintiff in
7 Intervention") through their respective counsel, hereby stipulate and agree as
8 follows:
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12 WHEREAS, the parties have agreed to mediation of this instant matter and
13 all related case CV 06-0031 and the EEOC's twenty-eight (28) pending charges
14 against Tan Holdings Incorporation and its related entities in order to reach a final
15 resolution. The parties in a concurrently filed stipulation are also requests a stay
16 in discovery in separate filed Case CV 06-0031 (EEOC v. L&T). The Parties ask
17 this Court to exercise its discretion, for good cause to stay discovery and amend the
18 current Scheduling Order;
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22 WHEREAS, L&T and the EEOC have been diligently litigating this matter,
23 conducting extensive discovery over the past several months moving this matter to
24 trial;
25

26 WHEREAS, the current discovery cut off date of September 1, 2008 will not
27 provide any of the Parties with adequate time to conduct mediation in connection
28

1 with the claims set forth in the "Complaint ". In addition a stay in this matter will
2 save both the government and defendant significant travel and litigation cost
3 associated with continued discovery in this matter.
4

5 WHEREAS, the parties have agreed to mediate this instant matter and all
6 related matters the week of August 4, 2008 in Saipan, Los Angeles or Hawaii.
7

8 WHEREAS, in order to accommodate counsels' commitments, previously
9 scheduled vacations, the mediator's schedule and the distant between California
10 and Saipan, the Parties request that stayed until August 29, 2008
11

12 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between L&T
13 and the EEOC that:
14

15 Subject, to this Court's approval, the discovery be stayed until August 29,
16 2008. That the discovery cut off be extended, from September 1, 2008 to
17 December 31, 2008 and all corresponding dates shall be correspondingly extended
18 consistent with the Proposed Order, filed concurrently with this Application.
19

20 Respectfully Submitted By:
21

U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION
Anna Y. Park
Gregory L. McClinton
Thomas S. Lepak

22
23
24 Date: June 23, 2008
25

/s/ Gregory L. McClinton
Gregory L. McClinton
Senior Trial Attorney
Attorneys for Plaintiff
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27
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DECLARATION OF MAILING

I am, and was at the time the herein mentioned delivery took place, a citizen of the United States, over the age of eighteen (18) years and not a party to the above-entitled cause.

I am employed in the Legal Unit of the Los Angeles District Office of the United States Equal Employment Opportunity Commission, Honolulu Local Office.

My business address is Equal Employment Opportunity Commission, 300 Ala Moana Boulevard, Room 7-127, Honolulu, Hawaii 50082

On the date that this declaration was executed, as shown below, I served the foregoing JOINT STIPULATION REGARDING STAY OF DISCOVERY AND APPLICATION TO AMEND SCHEDULING ORDER via e-mail/FAX and via regular mail with postage therein fully prepaid, at Honolulu, State of Hawaii, in envelopes addressed as follows:

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 23, 2008 at Honolulu, Hawaii

_____/S/
Wilma M. De Guzman
HLO-Legal Tech